

**REMARKS**

Claims 6, 8-10, 25, 28, 29, 32, 33, 35, 43, 45-53 are pending in the application. Claims 34 and 43 (which were rejected in the 4/14/10 Final OA) and claims 36-42 (which were withdrawn in the 4/14/10 Final OA as being directed towards an invention that is distinct from the previously presented invention) are cancelled herein. Claims 45-53 are added herein by way of RCE. Claims 6, 8-10, 25, 28, 29, 32, 33, 35, and 43 were rejected, and claims 6, 9, 32, 35, and 43 are amended herein. It is to be appreciated that while reference may be made back to certain parts of the application in this Reply (e.g., page numbers, line numbers, Figs., etc.), that such referencing is not to be interpreted in a limiting manner (e.g., to limit the scope of the claims and/or features therein to the particular portion(s) referenced), but is instead merely done for purposes of explanation, illustration and/or ease of understanding. Reconsideration of the application in light of the following remarks is respectfully requested.

**I. REJECTION OF CLAIMS 6, 8-10, 25, 28, 29, 32-35, 43 AND 44 UNDER 35 U.S.C. §112, FIRST PARAGRAPH**

Claims 6, 8-10, 25, 28, 29, 32-35, 43 and 44 are rejected under 35 U.S.C. § 112, first paragraph, for allegedly failing to comply with the written description requirement. Specifically, the Final OA dated 4/14/10 alleges that the negative limitation "wherein receiving the text string does not comprise receiving a selection of previously entered text" in amended independent claims 6 and 43 is not supported in the original disclosure. Amended claim 8, which depends from claim 6, is further rejected because the original disclosure allegedly does not disclose "wherein the first alphabet is a western alphabet and the third alphabet is an Indic alphabet" as recited in claim 8. Amended claims 34 and 44, which depend from independent claims 6 and 43, respectively, are further rejected because the original disclosure allegedly does not disclose the negative limitation, "the test string in the first alphabet not displayed to the user on the output device." Withdrawal of this rejection is respectfully requested for at least the following reasons.

**Independent claims 6 and 43** are amended herein, and as amended do not recite the negative limitations described above. **Claims 34 and 44** are cancelled herein.

It is respectfully submitted that **claim 8**, as previously amended, satisfies the written description requirement of 35 U.S.C. § 112, first paragraph. As provided in paragraph [41] of the instant application, "rather than configuring the keyboard layout to the traditional Hindi keyboard layout, the keyboard layout is configured to use the **US English keyboard layout** that is widely used in the United States." Stated differently, in one example, the text string in a first alphabet that is received on an input of the computing device is comprised of English characters (e.g., the first alphabet is English). Moreover, as provided in paragraph [46], "the flow of converting from a first language to a second language using an intermediary is shown where there is no direct mapping scheme available from the first language." For example, in one embodiment, there may be no direct mapping scheme from English (e.g., the alphabet of the text string) to Teluga (e.g., an Indic language), so an intermediary (e.g. a second Indic language) may be used. Thus, the instant application provides for, among other things, a first alphabet being a western alphabet (e.g., English) and a third alphabet being an Indic alphabet (e.g., Teluga) as provided for in claim 8. The Final OA is correct that in another embodiment, as described in paragraph [48], mapping may be done from one Indic language to another Indic language through a western alphabet. However, the instant application is not limited to such an embodiment and the disclosure provides for other embodiments, such as an embodiment described above, for example. Stated differently, paragraph [46] merely provides for converting from a first language to a second language using an intermediary language and does not specify the origin of the first, second, and/or intermediary alphabets.

For at least the foregoing reasons, withdrawal of this rejection is therefore respectfully requested.

**II. REJECTION OF CLAIMS 6, 8-10, 25, 28, 29, 32, 33, 35, AND 43 UNDER 35 U.S.C. §103(a)**

Claims 6, 8-10, 25, 28, 29, 32, 33, 35, and 43 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Janakiraman et al., U.S. Patent No.: 7,369,986 (*hereinafter* "Janakiraman"), in view of Bruso et al., U.S. Patent No.: 5,649,214 (*hereinafter* "Bruso"). Withdrawal of this rejection is respectfully requested for at least the following reasons.

Independent claims 6 and 43 provide for, among other things, receiving a text string in a first alphabet, converting the text string to a phonetic string in a second alphabet based on a first predefined phonetic mapping scheme, and converting the phonetic string in the second alphabet to a phonetic string in a third alphabet based on a second predefined phonetic mapping scheme. In this way, a text string in English may be converted to a phonetic string in Hindu and then converted to a phonetic string in Teluga, for example. Conversion to the second alphabet (e.g., an intermediary) before the third alphabet may be useful where there is no direct mapping scheme available from the first alphabet to the third alphabet, for example (*see, e.g.*, paragraph [46] of the instant application). It is respectfully submitted that the cited references fail to teach these features alone or in combination. For example, Janakiraman merely provides for converting a phrase from a first alphabet to a second alphabet (e.g., from Tamil to English) using a transliteration mechanism (*see* col. 5, line 55 through col. 6, line 44). Janakiraman does not provide for the further conversion of the phonetic string in the second alphabet to a third alphabet as provided for in the independent claims 6 and 43.

Moreover, it is respectfully submitted that Bruso, alone or in combination with Janakiraman, fails to teach this feature. Bruso teaches the gradual migration of data encoded in a Source Coded Character Set (e.g., a first alphabet) to a Destination Coded Character Set (e.g., a third alphabet) using an Intermediate Coded Character Set (*see e.g.*, col. 5, lines 39-43). In this way, while data is being migrated from the Source Coded Character Set to the Destination Coded Character Set, the data is still

usable and/or is not taken offline (*see, e.g.*, col. 2, lines 51-54; col. 3, lines 36-40). Importantly (e.g., to prevent the data from becoming unavailable), the data (e.g., the text string) is **never migrated to the Intermediate Coded Character Set** (*see*, col. 7, line 16 through col. 8, line 2). Such a migration is unnecessary (and undesirable) because the Intermediate Coded Character Set comprises all symbols and respective character codes of the Source Coded Character Set. Rather, the Intermediate Coded Character Set merely provides a means for selectively transliterating data encoded under the Source Coded Character Set (directly) to the Destination Coded Character Set and vice-versa. For example, where the character codes that are read from a data file being migrated are provided to an output device which supports the Destination Coded Character Set, the Intermediate Coded Character Set Support Software (and the Intermediate Coded Character Set) may be used to provide the character code reads in the Destination Coded Character Set encoding (col. 7, lines 34-43). Thus, neither Janakiraman or Bruso, alone or in combination, provided for converting a text string in a first alphabet to a phonetic string in a second alphabet based on a first predefined phonetic mapping scheme and then converting the text string in the second alphabet to a phonetic string in a third alphabet based on a second predefined phonetic mapping scheme as provided for in independent claims 6 and 43. Stated differently, the cited references do not teach a first conversion and a second conversion as provided for in independent claims 6 and 43.

Moreover, independent claim 43 provides for, among other things, the phonetic string in the second alphabet (e.g., the intermediary) comprising at least one character that is not present in the text string in the first alphabet. It is respectfully submitted that the cited references, alone or in combination, fail to teach this feature. For example, Bruso teaches that the Intermediate Coded Character Set is created such that it comprises all symbols of interest in the Source Coded Character Set and selected character codes from the Destination Coded Character Set (*see* col. 5, lines 43-58). For example, as illustrated in Fig. 5, the Intermediate Coded Character Set comprises all symbols of interest in the German Coded Character Set (illustrated in Fig. 2) and

their respective character codes (e.g., 40-176). Therefore, **the intermediary, or second alphabet (e.g., the Intermediate Coded Character Set) comprises all character codes associated with the symbols of interest in the first alphabet (e.g., the Source Coded Character Set)**. Thus, because any relevant symbol (e.g., a character which may be comprised in a text string in the first alphabet) is comprised in the Intermediate Coded Character Set, the symbol will not change regardless of whether the symbol is retrieved based upon the Source Coded Character Set or the Intermediate Coded Character Set. Janakiraman fails to make up for these deficiencies of Bruso, and it is thus respectfully submitted that the suggested combination fails to teach a phonetic string in a second alphabet comprising at least one character that is not present in a text string in a first alphabet as provided in claim 43.

For at least the foregoing reasons, independent claims 6 and 43, and claims depending therefrom, are believed to be allowable over the cited references. Withdrawal of the rejection is therefore respectfully requested.

### **III. NEW CLAIMS 45-53**

Claims 45-53 are added herein, and are believed to be allowable over the cited references for at least the following reasons. For example, **claims 45-50** depend from claim 6 and **claims 51-52** depend from claim 43, which are believed to be allowable for at least the foregoing reasons.

Moreover, **claim 53** provides for, among other things, determining whether a direct mapping scheme exists between a first alphabet and a second alphabet that is different than the first alphabet. If a direct mapping scheme does not exist, a text string in a first alphabet is converted into a phonetic string in an intermediate alphabet and then the phonetic string in the intermediate alphabet is converted into a phonetic string in the second alphabet. In this way, a text string in a first alphabet can be converted to a phonetic string in a second alphabet even where there is no predefined mapping scheme between the first and second alphabets, for example (*see e.g.*, paragraph 46 of the instant application). It is respectfully submitted that the cited references, alone or in

combination, do not teach this feature. For example, Janakiraman merely provides for transliterating a selected word or phrase from a first language to a target language or script (*see, e.g.*, Abstract). Janakiraman never teaches a technique for conversion where there is no direct mapping scheme.

Further, Bruso merely teaches the transliteration of data encoded in a first coded character set to a second coded character set (*see, e.g.*, Abstract). While Bruso teaches the use of an intermediate coded character set while the data is gradually being encoded, the data is never encoded in the intermediate coded character set. Thus, the only mapping scheme described in Bruso is a direct mapping scheme between the first coded character set and the second coded character set.

Therefore, neither reference provides for an alternative mapping scheme (e.g., from the first language to an intermediate language to the second language) if no direct mapping scheme exists.

Moreover, it will be appreciated that while new **claim 53** provides for determining whether a mapping scheme between the first and second alphabet exists, it is believed to be part of the elected species at least because it provides for mapping from a first alphabet to a second alphabet to a third alphabet similar to the elected species. It is not believed to be part of the second species at least because it does not create a mapping scheme as provided for in the non-elected species. Thus, new claim 53 is believed to be part of the elected species.

For at least the foregoing reasons, new claims 45-53 are believed to be allowable over the cited references. Allowance of the same is therefore respectfully requested.

**IV. CONCLUSION**

For at least the above reasons, the claims currently under consideration are believed to be in condition for allowance.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application; the Examiner is invited to contact the undersigned at the telephone number provided below.

Should and fees be due as a result of the filing of this response, the Commissioner is hereby authorized to charge the Deposit Account Number 50-5088, **306213.01**.

Respectfully submitted,  
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